



U.S. Department of Justice

United States Attorney
Eastern District of New York

WMP
F. #2013R01203

271 Cadman Plaza East
Brooklyn, New York 11201

January 22, 2015

By ECF

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Re: United States v. Abraxas Discala, et al.
Criminal Docket No. 14-399 (ENV)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. This disclosure supplements the government's earlier disclosures under cover of letters dated August 11, 2014, August 15, 2014, August 29, 2014, October 15, 2014, October 23, 2014 and January 6, 2015. The government again requests reciprocal discovery.

The government has made available at First Choice Copy ("First Choice"), for reproduction to the defendants, materials obtained from the Securities and Exchange Commission. Attached is an index entitled "Discovery Production Index" that lists the documents and data (Bates stamped EDNY-ITEN-000361014 – EDNY-ITEN-000369097) made available for reproduction to you by referencing print order number **80082**. You may obtain copies of the materials listed on the Discovery Production Index by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing print order number **80082**. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

Additionally, the government is, as a courtesy, making this document and data production available at First Choice for reproduction to the defendants as a "Concordance load file" under the print order number **80083**. The documents and data on the Concordance load file have been re-Bates stamped DOJ-ITEN-000505187 to DOJ-ITEN-000521300.

Defense Counsel
January 22, 2015
Page 2

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
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Enclosure

Cc: Clerk of Court (ENV) (by ECF) (w/ enclosure)